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VINCENT D. McNAMARA

OF COUNSEL

KAREN J. WALSH
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VINOD OCHAN

December 30, 2014

Hon. Vera M. Scanlon
United States Magistrate Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Porras v. Magnum Automotive, Inc. and Maurice Albanese*
EDNY Docket No.: 1:14-cv-07122 -SJ-VMS
Our: 798-4502

Dear Judge Scanlon:

We represent the defendants, *Magnum Automotive, Inc. and Maurice Albanese*, in the instant action and write with the consent of counsel for the plaintiff to request an extension of time to appear answer and/or move with respect to the Complaint in this action to February 18, 2015. A formatted Stipulation is enclosed with this letter motion.

Please let us know if you require the Stipulation with signatures to be submitted.

On behalf of all parties, we thank you for your thoughtful consideration of this request.

Respectfully yours,
/s/ Helen M. Benzie
Helen M. Benzie

HMB

CC: L Franco Electronic Service-Fax

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ISAAC PORRAS, Individually and on Behalf
of Others Similarly Situated,

Case 1:14-cv-07122-SJ-VMS

Plaintiff,

STIPULATION EXTENDING
TIME TO ANSWER

-against-

MAGNUM AUTOMOTIVE INC. (d/b/a
MAGNUM AUTOMOTIVE) and MAURICE
ALBANESE,

Defendants.

X

IT IS HEREBY STIPULATED AND AGREED, that the time for the defendants,
MAGNUM AUTOMOTIVE INC. (d/b/a MAGNUM AUTOMOTIVE) and MAURICE
ALBANESE to appear, answer and/or move with respect to the Complaint in this action be and
the same hereby is extended to **February 18, 2015**.

The defendants agree to waive all personal jurisdictional defenses.

Dated: East Norwich, New York
December 22, 2014

LAW OFFICE OF VINCENT D. McNAMARA

/s/ *Helen M. Benzie*

By: _____
Helen M. Benzie (HMB2987)
Attorneys for Defendants
1045 Oyster Bay Road, Suite 1
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(516) 922-9100

FUSTER LAW, P.C.

/s/ *Lima M. Franco*

By: _____
Lima M. Franco (LF1102)
Attorneys for Plaintiff
31-10 37th Avenue, Suite 204
Long Island City, New York 11101
(718) 702-1622

SO ORDERED:

U.S.M.J.

DATED